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15 [Additional counsel appear on signature page]

16 UNITED STATES DISTRICT COURT

17 DISTRICT OF NEVADA

18 **Cung Le, Nathan Quarry, Jon Fitch, Brandon**
19 **Vera, Luis Javier Vazquez, and Kyle**
20 **Kingsbury on behalf of themselves and all**
others similarly situated,

21 **Plaintiffs,**

22 **vs.**

23 **Zuffa, LLC, d/b/a Ultimate Fighting**
24 **Championship and UFC,**

25 **Defendant.**

Case No.: 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO
LODGE MATERIALS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-5(a),
 2 and Section 14.3 of the Revised Stipulation and Protective Order (the “Protective Order”) issued by
 3 this Court on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,
 4 Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others
 5 similarly situated (collectively, “Plaintiffs”) hereby move this Court for leave to lodge certain
 6 documents under seal related to their Reply Brief in Support of Emergency Motion to Compel
 7 Production of Documents Withheld on Privilege Grounds and for Other Relief.

8 Under Section 14.3 of the Protective Order, documents designated Confidential or Highly
 9 Confidential – Attorneys’ Eyes Only “shall be provisionally lodged under seal with the Court, and
 10 redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the Court,
 11 the Party claiming protection shall file motion to seal setting forth the bases for sealing and proper
 12 authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), or some
 13 other applicable authority.”

14 Plaintiffs seek leave to lodge under Exhibits 6, 7, 8, and 9 to the Saveri Declaration, which
 15 are documents that have been designated Confidential or Highly Confidential – Attorneys’ Eyes
 16 Only or portions of Zuffa’s privilege log.

17 Plaintiffs have filed all of these documents under seal, in accordance with the Court’s ECF
 18 system, with the instant motion. Plaintiffs have publicly filed placeholders for redacted versions of
 19 these documents with the Court, and will serve un-redacted versions of these documents on
 20 Defendant.

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1 DATED this 24th day of July, 2017.

2 **JOSEPH SAVERI LAW FIRM, INC.**

3 By: /s/ Kevin E. Rayhill

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of July, 2017 a true and correct copy of
PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL was served via the
United States District Court CM/ECF system on all parties or persons requiring notice.

By:

/s/ Kevin E. Rayhill

Kevin E. Rayhill